

REMARKS

Claims 1-27 are currently pending in the present application, of which claims 6, 13 and 26 have been withdrawn. No amendments have been made.

Reconsideration and the timely allowance of the pending claims, in view of the following remarks, are respectfully requested.

Applicant reserves the right to request rejoinder of the non-elected claims or file a divisional application drawn to the non-elected subject matter.

Claims 1-5, 7-10, 12, 15-25 and 27 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,610,683 to Takahashi ("Takahashi"). Applicant traverses this rejection for at least the following reasons.

Applicant respectfully submits that the cited portions of Takahashi fail to disclose, teach or suggest a lithographic apparatus comprising, *inter alia*, a liquid supply system configured to supply a liquid to a localized area of the substrate, as recited in claim 1. Similarly, Applicant respectfully submits that the cited portions of Takahashi fail to disclose, teach or suggest a device manufacturing method comprising, *inter alia*, providing a liquid to a localized area of a substrate, as recited in claim 19.

For example, Takahashi discloses that the wafer 2 is completely immersed in liquid 23. *See* Col 5, lines 63-65 of Takahashi (disclosing that the cassette 9 in which wafer 2 is mounted is filled with a liquid 23). Further, the cited portions of Takahashi make no mention or suggestion of supplying a liquid to a localized area of the substrate. As such, Applicant submits that the cited portions of Takahashi fail to disclose, teach or suggest supplying a liquid to a localized area of the substrate. An advantage of the claimed invention is to provide a barrier to collect liquid in a localized immersion lithography arrangement. In contrast, the arrangement in Takahashi merely is a container for a fully liquid immersed or covered substrate.

Accordingly, the cited portions of Takahashi fail to disclose, teach or suggest all the features recited by claims 1 and 19. Claims 2-5, 7-10, 12, and 15-18 depend from claim 1; and claims 20-25 and 27 depend from claim 19; and are patentable for at least the same reasons provided above related to claims 1 and 19 and for the additional features recited therein. As a result, Applicant respectfully submits that the rejection under 35 U.S.C. §102(b)

of claims 1-5, 7-10, 12, 15-25 and 27 over Takahashi should be withdrawn and the claims allowed.

Claim 11 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Takahashi in view of U.S. Patent Application Publication No. 2004/0119795 to Noolandi et al. ("Noolandi"). Applicant traverses this rejection for at least the following reasons.

Claim 11 depends from claim 1. As discussed above the cited portions of Takahashi fail to disclose, teach, or suggest each and every feature of claim 1, or the claims that depend from claim 1.

Further, Applicant submits that the cited portions of Noolandi do not overcome the shortcomings of Takahashi. First, Applicant submits that Noolandi is non-analogous art that cannot be properly applied here. Noolandi discloses a device for dispensing particulate matter, which is not at all related to lithography. Thus, Applicant submits that Noolandi is not a reference that "logically would have commended itself to an inventor's attention in considering his problem." *See In re Clay*, 966 F.2d 656, 659, 23 USPQ2d 1058, 1060-61 (Fed. Cir. 1992).

Moreover, even assuming, *arguendo*, that Noolandi is analogous art, Applicant respectfully submits that the cited portions of Noolandi fail to disclose a substrate, let alone, a liquid supply system configured to supply a liquid to a localized area of the substrate.

Accordingly, the cited portions of Takahashi, Noolandi, or a reasonable combination thereof fail to disclose, teach or suggest all the features recited by claim 1. Claim 11 depends from claim 1 and is patentable for at least the same reasons provided above related to claim 1 and for the additional features recited therein. As a result, Applicant respectfully submits that the rejection under 35 U.S.C. §103(a) of claim 11 over Takahashi in view of Noolandi should be withdrawn and the claim be allowed.

All matters having been addressed and in view of the foregoing, Applicant respectfully requests reconsideration of this application, and the immediate allowance of all pending claims.

Applicant's representative remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter. If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,


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Date: May 29, 2007
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